REMARKS

In the Office Action dated August 15, 2003, claims 1, 2, 5-11, 13-18, 20-23, 26-31, 34, 36-38, 41, and 43-46 were rejected under 35 U.S.C. § 102 over U.S. Patent No. 6,078,582 (Curry); and claims 3, 4, 12-14, 25-27, 38, 39, 40, 42, 47, and 48 were rejected under § 103 over Curry.

In response to Applicants' arguments presented in the Reply to the Office Action of 3/27/2003, the Examiner pointed to the abstract of Curry as teaching the encapsulation of stimulus control information. The abstract of Curry states that a communication system uses an interface server to encapsulate communication traffic and signaling data. This statement in the abstract is explained further in the specification of Curry, which clearly indicates that the signaling data being encapsulated is *not* stimulus control information.

As explained in Curry, an Internet telephony server (ITS) 72 provides an interface between a telephone system 62 and a wide area packet switched network 74 (*see* Figure 6 of Curry). More specifically, as depicted in Figure 6 of Curry, the ITS 72 is connected between a central office (CO) 41 and the network 74. The ITS 72 receives a CCIS (common channel interoffice signaling) query message from *the central office 41*. Curry, 15:14-17. It is the central office 41a disclosed in Curry that receives stimulus control information, such as an off-hook indication, key press, etc. Curry, 14:66-15:10. In response to the off-hook and dialed digits *82, the central office of Curry *suspends the call* and sends a *CCIS query message* to the ITS 72. Curry, 15:14-17. CCIS provides for signaling between end offices and tandem switching systems, such as the end offices and switching tandem systems shown in Figure 2 of Curry. A CCIS query does not constitute stimulus control information. In response to a CCIS query, the ITS 72 of Curry performs further processing, and then sends a signaling message in the form of a query message packetized in TCP/IP packets. Curry, 15:33-37. The query message packetized in TCP/IP packets, which are sent to a destination ITS 72b, also does not constitute stimulus control information. The destination ITS 72b extracts the payload from the received packets on behalf of the destination central office 41b. Curry 15:33-48. It is thus clear that the message carried in the TCP/IP packets exchanged between ITSs are inter-central

office messages, not stimulus control information. Therefore, the ITS 72 does *not* encapsulate stimulus control information.

Moreover, claim 1 recites a controller to receive *stimulus control information* from a digital interface and to *encapsulate the stimulus control information* into one or more packets. There is no indication in Curry that the CCIS query message received by the ITS 72 is actually the message encapsulated by the ITS. Thus, there is no teaching by Curry of receiving control information and encapsulating *the* control information.

Therefore, claim 1 is allowable over Curry.

Claims that depend from claim 1 are allowable for at least the same reasons as claim 1. Moreover, with respect to dependent claim 17, Curry does not disclose a controller to encapsulate at least one of a hook state information and key press event information into one or more packets. The Office Action pointed to the passage at col. 14, lines 9-17, and elements 136 and 146 of Fig. 9 of Curry as disclosing such a feature. Applicants respectfully disagree. The cited col. 14 passage describes a telephony platform 100 in the ITS 72 that performs basic telephony functions, including incoming call detection (ringing, trunk seizure, etc.), call supervision/progress detection (busy tone, disconnect, connect, recorded announcement, dial tone, speech, etc.), call origination, DTMF, call termination, call disconnect, switch hook flash, and so forth. However, there is absolutely no indication that such information is encapsulated into one or more packets by the ITS 72 disclosed in Curry.

What is packetized by the ITS is a signaling message in the form of a query message. Curry, 15:33-36. This signaling message in the form of a query message does *not* contain a hook state information or a key press event information.

Also, the information contained in the query message of Curry does not contain *a handset* volume control command, a *handset* connect/disconnect command, and *ringer* activation command, as recited in claim 18.

The messaging exchanged between the ITSs 72 (the originating ITS 72a and destination ITS 72b) are messaging exchanged between switches or other stimulus devices, not messaging relating to terminals such as the hook state information, key press event information, handset volume control command, handset connect/disconnect

command and ringer activation command.

Similarly, with respect to claim 37, Curry does not disclose the controller to encapsulate a command selected from the group consisting of off-hook, on-hook, handset volume control, handset connect, and handset disconnect in one or more packets.

With respect to independent claim 20, Curry does not disclose encapsulating stimulus control information received from a first interface that communicates stimulus control information with a stimulus device.

Claims dependent from claim 20 are allowable for at least the same reasons as for claim 20. Moreover, with respect to dependent claim 41, Curry does not disclose encapsulating a command according to a stimulus protocol selected from the group consisting of off-hook, on-hook, handset volume control, handset connect, and handset disconnect.

With respect to independent claim 28, Curry does not disclose encapsulating data according to a stimulus protocol into one or more packets for communication to a packet-based network.

Claims dependent from independent claim 28 are allowable for at least the same reasons as for claim 28. Moreover, with respect to dependent claim 43, Curry fails to disclose encapsulating data according to a stimulus protocol that includes encapsulating one of an off-hook stimulus command, on-hook stimulus command, handset volume control stimulus command, handset connect stimulus command, and handset disconnect stimulus command.

With respect to independent claim 34, Curry does not disclose a means for encapsulating a stimulus message from a stimulus device.

Claims dependent from claim 34 are allowable for at least the same reasons as for claim 34. Moreover, with respect to dependent claim 45, Curry fails to disclose that the means for encapsulating is to encapsulate the command selected from the group consisting of off-hook, on-hook, handset volume control, handset connect, and handset disconnect.

With respect to independent claim 30, Curry does not disclose receiving at least one packet containing a stimulus message according to a first language, and

decapsulating the at least one packet to extract the stimulus message according to the first language.

Claims dependent from claim 30 are allowable over Curry for at least the same reasons as for claim 30. Moreover, with respect to dependent claim 44, Curry fails to disclose receiving at least one packet containing at least a command selected from the group consisting of off-hook, on-hook, handset volume control, handset connect and handset disconnect.

Claims 3, 4, 12-14, 25-27, 35, 39, 40, 42, 47, and 48 were rejected as obvious over Curry. The Examiner took official notice that the missing elements were well known. Applicants respectfully disagree that there is any suggestion anywhere in Curry or any other prior art knowledge of the modification of Curry proposed by the Examiner. If objective proof of such knowledge exists, Applicant respectfully requests production of such objective proof. Otherwise, withdrawal of the § 103 rejection is respectfully requested. This respect was made in the Reply to Final Office Action submitted on October 15, 2003. However, to date, no references have been produced to support the official notice.

With respect to claim 3, there is absolutely no suggestion anywhere within Curry of a digital interface that includes a UART interface. In fact, Curry describes the connection between the ITS 72 and the local central office 41 as being a standard voice grade line or trunk connection 68, for example a T-1 or T-3 connection. Curry, 12:2-5. This is a strong indication that the interface used in the ITS *cannot* be a UART interface.

Similarly, with respect to dependent claim 4, there is absolutely no suggestion or hint anywhere within Curry that the digital interface of the apparatus includes a time compression multiplex interface. No support has been cited by the Office Action regarding the presence of any motivation or suggestion to modify Curry to use a time compression multiplex interface.

With respect to claim 12, there is no suggestion anywhere in Curry of header information that includes a User Datagram Protocol (UDP) header. Although TCP/IP packets are mentioned in Curry, there is no suggestion that the TCP header in such packets can be replaced with UDP headers. Curry similarly does not disclose or suggest

the subject of dependent claims 25, 39 and 42.

With respect to claim 13, there is no suggestion anywhere in Curry that the ITS scrambles a stimulus message before encapsulation. Similarly, Curry does not disclose or suggest the subject of dependent claims 26 and 48. With respect to dependent claim 14, there is no hint or suggestion anywhere within Curry of a controller to encrypt one or more packets. Curry similarly does not disclose or suggest the subject of claims 27 and 47.

With respect to dependent claim 35, Curry does not disclose an interface card adapted to be inserted into a slot of a stimulus device, with the interface card having the digital interface, a packet interface, and a controller. Curry similarly does not disclose or suggest the subject of claim 40.

Newly dependent claims 49 and 50 are also allowable over Curry, since Curry does not disclose an interface card adapted to be inserted into a slot of a telephone.

Allowance of all claims is respectfully requested. The Commissioner is authorized to charge any additional fees, including extension of time fees, and/or credit any overpayment to Deposit Account No. 20-1504 (NRC.0002US).

Respectfully submitted,

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Date

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